

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, ET, AL.

Plaintiffs

v.

COMM. STANLEY TAYLOR, ET, AL.

Defendants.

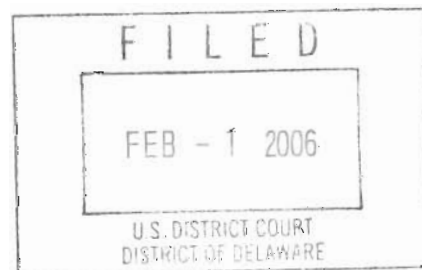
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C.A. NO.: 05-399-JJF

MOTION FOR APPOINTMENT OF COUNSEL

PLAINTIFFS , PURSUANT TO § 1915, requests this court to appoint counsel to represent them in this case for the following reasons:

1. The Plaintiffs is unable to afford counsel.
2. The issues involved in this case are complex.
3. The Plaintiffs has limited access to the law library.
4. The Plaintiffs has a limited knowledge of the law.



For the following reasons, Plaintiffs ask that this court grant them Motion for appointment of counsel.

Date:

1/27/06

By:

James A. Wilson, ET, AL.
S.C.I.P.O. Box 500
Georgetown, DE. 19947

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FOR THE DISTRICT OF DELAWARE

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Defendants,

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AFFIDAVIT IN SUPPORT OF THE PLAINTIFFS MOTION FOR THE APPOINTMENT
OF COUNSEL

PLAINTIFFS, being duly sworn, deposes and says:

1. I am the plaintiff in the above entitled case and ET, Al.. I make this affidavit in support of my motion for the appointment of counsel.
2. The complaint in this case alleges that the plaintiffs was denied their fourteenth Amendment due process, their fourteenth Amendment equal protection, Eighth Amendment excessive force and their Eighth Amendment failure to protect . Whereas black Inmates' are moved before Due Process is complete while white Inmates are not, black inmates are more likely to sprayed with mace through excessive force, and that white inmates are given the more desirable paying jobs.
3. This is a complex case because it contains several different legal claims, with each claim involving a different set of defendants.
4. The plaintiffs' had demanded a jury trial.
5. The case will require discovery of documents and depositions of a number of witnesses.
6. S.C.I. policy prohibits inmates from working on other inmates legal matter.
7. Inmates that are involved in this case are housed in different buildings.
8. Plaintiffs has no ability to investigate the facts of the case, for example, by locating interviewing the inmates that has moved or went home or the officer that no longer work with the institution.
9. As set forth in the Memorandum of Law submitted with this motion, these facts, along with the legal merit of the plaintiffs' claims, support the appointment of counsel to represent the plaintiffs.

WHEREFORE, THE plaintiffs motion for the appointment of counsel should be granted.

Date:

1/27/06

S.C.I.P.O. BOX 500

I/M: JAMES A. WILSON, III, MERIT/EAST
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500
GEORGETOWN, DELAWARE 19947



UNITED STATES DISTRICT COURT

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